

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
Debtor : No. 16-15095AMC

Markiea D. Ward

ANSWER TO MOTION FOR RELIEF AND CERTIFICATE OF SERVICE

The Debtor has a good track record over the last two years of making payments and it is requested that the debtor be given a chance to get caught up.

WHEREFORE Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor

Dated: 09/23/18

The Chapter 13 Trustee and Mario Hanyon, Esq. Are being served with a copy of the Answer by electronic mail.

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor